## UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF OHIO EASTERN DIVISION

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) CASE NO. 1:14-CV-02044
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) JUDGE CHRISTOPHER A. BOYKO
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)
) PLAINTIFF'S MOTION FOR
) PRELIMINARY PROTECTIVE ORDE
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)

Plaintiff respectfully moves this Honorable Court under Fed. R. Civ. P. 5.2(e) for a preliminary order protecting Plaintiff and Jane Roe's names from public disclosure during the initial stages of litigation. Because service has yet to be perfected and counsel has yet to make an appearance, Plaintiff has not conferred with the Parties on this matter. However, the Motion is supported by good cause. Plaintiff seeks a protective order concerning his and Jane Roe's true names, in order to protect highly sensitive and personal details about their relations and, relatedly, to protect Plaintiff's professional reputation. *Doe v. Porter*, 370 F.3d 558 (6th Cir. 2004); *Citizens for a Strong Ohio v. Marsh*, 123 F. App'x 630 (6th Cir. Jan. 3, 2005); *G.E.G. v. Shineski*, Case No. 1:10-CV-1124, 2012 U.S. Dist. LEXIS 13973 (W.D. Mich. Feb. 6, 2012).

Pending further discussion among the Parties regarding the use of Jane Roe's and Plaintiff's names in pleading and discovery matters, Plaintiff asks the Court to protect the true names of Plaintiff and Jane Roe from public disclosure.

WHEREFORE, Plaintiff prays that this Honorable Court grant his Motion and issue a preliminary order protecting him and Jane Roe from the public disclosure of their true names.

Respectfully submitted,

s/ Terry H. Gilbert

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Attorney for Plaintiff

## **CERTIFICATE OF SERVICE**

I hereby certify that on September 17, 2014, a copy of the foregoing was filed electronically. Notice of this filing is available to all registered parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system. A copy of the foregoing was also sent via regular U.S. mail to all Parties:

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